

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

**DOCKET NO. 2019-14-C**

**ASSURANCE WIRELESS' ANNUAL  
ELIGIBLE TELECOMMUNICATIONS CARRIER REPORT**

**June 24, 2019**

## **I. INTRODUCTION**

Assurance Wireless of South Carolina, LLC (“Assurance Wireless” or “Company”) submits this Annual Report, pursuant to Order No. 2011-76, and respectfully requests the Commission certify its eligibility for low-cost support from the federal universal service fund for calendar year 2020. Assurance Wireless is a competitive carrier that has been designated as an Eligible Telecommunications Carrier (“ETC”) solely for purposes of offering prepaid wireless telecommunications services supported by the Lifeline program. Its ETC designation does not entitle it to receive high-cost support from the federal universal service fund.

In 26 S.C. Code Ann. Regs. 103-690.1 the Commission specifies its annual reporting requirements for ETCs. Please find herein information responsive to those requirements.

## **II. COMPLIANCE WITH CTIA CONSUMER CODE FOR WIRELESS SERVICE AND OTHER SERVICE QUALITY AND CONSUMER PROTECTION RULES**

The Commission requires a wireless ETC to certify that it is complying with all applicable service quality standards and consumer protection rules, e.g., the CTIA Consumer Code for Wireless Service.<sup>1</sup> Assurance Wireless affiliate Virgin Mobile USA, L.P. became a voluntary signatory to the Consumer Code in 2004. Since adopting the Consumer Code, Virgin Mobile and its affiliates have implemented the policies and practices required of signatories. This means that Assurance Wireless has implemented policies so that it:

- (1) Discloses rates and terms of service to consumers.
- (2) Makes available maps showing where service is generally available.
- (3) Provides contract terms to customers and confirms changes in service.
- (4) Allows a trial period for new service.
- (5) Provides specific disclosures in advertising.
- (6) Separately identifies carrier charges from taxes on billing statements.
- (7) Provides customers the right to terminate service for material changes to contract terms.
- (8) Provides ready access to customer service.

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<sup>1</sup> 26 S.C. Code Ann. Regs. 103-690.1(B)(a), 103-690.1(B)(b)(5).

- (9) Promptly responds to consumer inquiries and complaints received from government agencies.
- (10) Abides by policies for protection of customer privacy.
- (11) Provides consumers with free notifications for voice, data messaging usage, and international roaming.
- (12) Mobile wireless device unlocking.

Assurance Wireless certifies that it is in compliance with all applicable service quality and consumer protection requirements and standards, including the CTIA Consumer Code for Wireless Service. A copy of CTIA's most recent certification issued to Assurance Wireless and its affiliates is included as **Attachment 1**. Assurance Wireless has complied and will continue to comply with the principles set forth therein.

### **III. ASSURANCE WIRELESS' LIFELINE REPORTING**

#### **A. Assurance Wireless' Unfulfilled Requests For Service**

An ETC must make an annual report of the number of requests for service from potential customers within its service areas that were unfulfilled for the most recent calendar year.<sup>2</sup> The filing must also detail how it attempted to provide service to those potential customers. Assurance Wireless did not have any unfulfilled requests for service from qualified applicants in 2018.

#### **B. Assurance Wireless' Complaints Per 1,000 Handsets Or Lines**

The Commission requires an ETC to annually report the total number of complaints and number of complaints per 1,000 handsets or lines for the most recent calendar year.<sup>3</sup> Assurance Wireless had 0.2067 complaints per 1,000 handsets for the 2018 calendar year.

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<sup>2</sup> 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(3).

<sup>3</sup> 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(4).

**C. Assurance Wireless' Certification Regarding Emergency Functionality**

The Commission requires an ETC to certify that it is able to function in emergency situations.<sup>4</sup> Virgin Mobile is an affiliate of Sprint Corporation ("Sprint"), provides service using the Sprint network and certifies that it is able to remain functional in emergency situations based on FCC Rule 54.202(a)(2). Sprint has a detailed Business Continuity Program that meets this requirement. The Business Continuity Program is the framework in which Sprint sets policies for network resiliency, the development and conduct of emergency preparedness exercises and the formation of its Emergency Response Team. Attached as **Attachment 2**, please find a copy of the Sprint Business Continuity Planning Program Overview.

**D. Assurance Wireless' Certification Regarding Its Provision Of A Comparable Local Usage Plan**

The Commission requires an ETC to certify that it has a local usage plan comparable to the incumbent LEC in the relevant service area.<sup>5</sup> Assurance Wireless's bundled Lifeline service offering provides new eligible customers with 350 anytime prepaid minutes, unlimited texts and 2 GB of data each month at no charge. Existing Virgin Mobile Voice Lifeline customers were all upgraded to an offer that provides 1,000 anytime prepaid minutes and unlimited texts at no charge. Additional minutes are priced at \$0.10/minute for local and long-distance calling. Assurance Wireless Lifeline customers entirely at their option can purchase blocks of additional services. Under the first option, Lifeline customers can add \$5 to their account to purchase an additional 250 monthly minutes, providing bundled customers with a total of 600 voice minutes in a month (350 free minutes plus 250 additional minutes), plus unlimited texts. Voice customers can

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<sup>4</sup> 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(6)

<sup>5</sup> 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(7)

purchase the same \$5 offer which provides them a total of 1,250 minutes in a month (1,000 free minutes plus 250 additional minutes). Feature phone customers only can also add \$30 to their account to purchase unlimited talk, text and web. The rates for service under all plans include all applicable taxes and fees, and customers can use their monthly minutes to place calls statewide (or even nationwide) because none of the plans imposes a local calling area requirement. Each service plan also includes voicemail, caller ID and call waiting services at no additional charge. Assurance Wireless also does not assess additional charges for activation or connection of Lifeline service. As a result, Lifeline customers will receive free service with no additional charges for taxes or activation. Customers are also able to purchase a wide selection of data packs and bundle minute and data offers which provide additional minutes and/or data to meet their needs for additional voice or data usage. Accordingly, Assurance Wireless offers a variety of plans in South Carolina that do not have a limited calling scope. Assurance Wireless certifies that it offers a local usage plan comparable to the incumbent LEC in relevant service areas in South Carolina.

**E. Assurance Wireless' Certification Regarding The Requirement To Provide Equal Access**

As required by the Commission<sup>6</sup>, Assurance Wireless acknowledges that the Federal Communications Commission may require it to provide equal access to long-distance carriers in the event that no other ETC is providing equal access within one of its Service Areas.

**F. Number of Lifeline Customers**

The Commission requires ETCs to inform it of the number of customers receiving service in the prior year.<sup>7</sup> Assurance Wireless had 43,535 customers as of December 31, 2018.

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<sup>6</sup> 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(8)

<sup>7</sup> 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(9)

**G. Copies of Responses to Lifeline Verification Survey or Certification filed with USAC**

The Commission requires ETCs to file copies of responses to the Lifeline Verification Survey or Certification filed with the Universal Service Administrative Company (“USAC”) on August 31 of each year.<sup>8</sup> Attached as **Attachment 3**, please find a copy of Assurance Wireless’s most recent Lifeline Verification Survey or Certification filed with USAC.

**IV. CONCLUSION**

Assurance Wireless respectfully requests that the Commission certify the Company’s eligibility to receive low-income universal service funds in accordance with 47 C.F.R. § 54.401.

Respectfully submitted,

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<sup>8</sup> 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(10)